

THE CITY OF NEW YORK LAW DEPARTMENT

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January 9, 2024

Defendants' request to filed unredacted copies of

their summary-judgment reply papers that

reference grand-jury testimony under seal is

VIA E.C.F.

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel

Honorable Jennifer L. Rochon United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Dated: January 10, 2024 New York, New York

GRANTED.

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SO ORDERED.

Re: <u>Jonathan Banyan v. P.O. Sikorski, et al.</u>,

17 Civ. 4942 (JLR)

Jernifer Rochon

JENNIEER L. ROCHON United States District Judge

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney representing the City of New York, Ian Rule, Craig Sikorski, Joseph Tennariello, and John Becerra (collectively, "Defendants") in the above-referenced matter. Defendants write to respectfully request, with Plaintiff's consent, leave to file unredacted copies of their summary judgment reply motion papers that reference grand jury testimony under seal.

By way of relevant background, the Court has permitted the parties to file certain documents concerning the Defendants' summary judgment motion under seal because those documents reference grand jury testimony, or contain a portion of grand jury testimony. (See Dkt. Nos. 279, 285.)

The Defendants' Reply papers concerning their summary judgment motion are due on January 11, 2024 (see Dkt. No. 293), and will likewise make references to grand jury testimony.

Accordingly, the Defendants respectfully request, with Plaintiff's consent, that they be permitted to file unredacted copies of their reply motion papers that reference grand jury testimony under seal.

The Defendants thank the Court for its consideration.

Respectfully submitted,

|s| Nicolette Pellegrino

Nicolette Pellegrino

Assistant Corporation Counsel

Special Federal Litigation Division

CC: VIA E.C.F.
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